

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10039-NG
)	
ANDRES DEL ROSARIO ALAYON)	
)	

JOINT MOTION TO CONTINUE SUPPRESSION HEARING AND TO
EXCLUDE TIME UNDER SPEEDY TRIAL ACT

The United States of America, by its attorneys, Michael J. Sullivan, United States Attorney, and Cynthia W. Lie, Assistant U.S. Attorney, and the defendant, hereby respectfully move, for a continuance of the motion to suppress hearing currently scheduled for February 13, 2006. The parties request a 45 day continuance or a date thereafter that is convenient for the Court. The reason for this motion is that the defendant is attempting to cooperate with the government. Furthermore, the attorney for the defendant currently has a sentencing at 2pm before the Honorable Reginald C. Lindsay on February 13th, and the prosecutor will be in Washington DC on that afternoon as well.

The parties also move pursuant to 18 U.S.C. § 3161(h) and Section 5(f)(4) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, in computing time within which the trial of this matter shall commence under 18 U.S.C § 3161(c)(1), for an order to exclude time from the originally scheduled

hearing date on the pending motion to suppress, February 13, 2006, to the new date, in the interests of justice.

Respectfully submitted,

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February 6, 2006

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